

# **EXHIBIT 6**

**From:** [David Grassi](#)  
**To:** ["Daniel Zemel"](#)  
**Cc:** [Chad Diamond](#); [Nicholas Linker](#); [Chad Echols](#); [Salley Odom](#)  
**Subject:** RE: Hallager v ARS Discovery Responses  
**Date:** Tuesday, August 24, 2021 4:39:00 PM  
**Attachments:** [image001.png](#)

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Thanks, Daniel. I wanted to get back to you regarding your client's demand. We are authorized to counter at [REDACTED]

Also, can you please confirm the deposition for Experian on Friday. I ask because the draft subpoena I received indicates a midnight start time, I have not received any follow up indicating it has been served, and I have not yet received any sort of Zoom link for the deposition.

Finally, please confirm your client is available for the deposition we noticed. If it is something we need to change, we need to know ASAP so we can rebook the stenographer and videographer.

Thank you,

**David A. Grassi**  
**Attorney**  
The Echols Firm, llc  
224 Oakland Ave. (29730)  
P.O. Box 12645  
Rock Hill, South Carolina 29731  
[803.329.8982](tel:803.329.8982)  
[david.grassi@theecholsfirm.com](mailto:david.grassi@theecholsfirm.com)



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**From:** Daniel Zemel <dz@zemellawllc.com>

**Sent:** Friday, August 20, 2021 4:38 PM

**To:** David Grassi <David.Grassi@theecholsfirm.com>

**Cc:** Chad Diamond <chad.diamond@gmail.com>; Nicholas Linker <NL@zemellawllc.com>; Chad Echols <chad.echols@theecholsfirm.com>; Salley Odom <salley.odom@theecholsfirm.com>

**Subject:** Re: Hallager v ARS Discovery Responses

Thanks David. I will agree to withdraw the objections.

On Fri, Aug 20, 2021 at 3:46 PM David Grassi <[David.Grassi@theecholsfirm.com](mailto:David.Grassi@theecholsfirm.com)> wrote:

I will take to my client and let you know. [REDACTED]

In our Rule 26(f) report, we designated Rene Trehy as mediator. I just sent her correspondence regarding scheduling and copied you.

Thanks,

**David A. Grassi**

**Attorney**

The Echols Firm, llc

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**From:** Daniel Zemel <[dz@zemellawllc.com](mailto:dz@zemellawllc.com)>

**Sent:** Friday, August 20, 2021 3:42 PM

**To:** David Grassi <[David.Grassi@theecholsfirm.com](mailto:David.Grassi@theecholsfirm.com)>

**Cc:** Chad Diamond <[chad.diamond@gmail.com](mailto:chad.diamond@gmail.com)>; Nicholas Linker <[NL@zemellawllc.com](mailto:NL@zemellawllc.com)>; Chad Echols <[chad.echols@theecholsfirm.com](mailto:chad.echols@theecholsfirm.com)>; Salley Odom <[salley.odom@theecholsfirm.com](mailto:salley.odom@theecholsfirm.com)>

**Subject:** Re: Hallager v ARS Discovery Responses

Sorry David.

Concerning settlement and mediation, Plaintiff demands [REDACTED]. Did you and Steve agree on a mediator? I will see if this proposed date works for my client.

On Fri, Aug 20, 2021 at 3:40 PM David Grassi <[David.Grassi@theecholsfirm.com](mailto:David.Grassi@theecholsfirm.com)> wrote:

Daniel,

Since I have not heard back from you regarding anything in my email below, and since the discovery window is quickly closing, we had no choice but to go ahead and set your client's deposition date. Please see the attached notice of deposition for your client, along with a cover letter serving same. I will also be sending a letter to the mediator shortly, since our deadline to mediate is also four weeks out.

As for deposition dates of my clients, they have indicated they have some availability during the first two full weeks of September. They cannot determine the exact availability without a topic list, since the designee would likely vary depending on the topics. Please forward that when you get a chance and we can get that date nailed down.

Let me know if you have any questions.

Thank you,

**David A. Grassi**

**Attorney**

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